

Noah Kane, Esq.  
**Consumer Attorneys PLLC**  
68-29 Main Street  
Flushing, NY 11367  
518-375-3963  
Fax: 718-715-1750  
Email: e-service@consumerattorneys.com

*Attorneys for Plaintiff Valerie Piskorowski*

James J. Lee, Esq.  
Nevada Bar No. 001909  
**Legal Offices of James J. Lee**  
2620 Regatta Dr. #102  
Las Vegas, NV 89102  
702-664-6545  
Fax: 702-946-1115  
Email: james@leelitigate.com

*Attorneys for Defendant The Bank of Missouri*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VALERIE PISKOROWSKI

Plaintiff.

V.

**EXPERIAN INFORMATION  
SOLUTIONS, INC., EQUIFAX  
INFORMATION SERVICES, LLC,  
TRANS UNION LLC, AND THE  
BANK OF MISSOURI.**

### Defendants.

Case No.: 2:25-cv-00122-JCM-DJA

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT THE BANK OF  
MISSOURI TO RESPOND TO  
COMPLAINT**

## **SECOND REQUEST**

Defendant The Bank of Missouri (“TBOM”) has requested a second extension of time to answer, move or otherwise respond to the Complaint of Plaintiff Valerie Piskorowski (“Plaintiff” and together with TBOM, the “Parties”), to which Plaintiff has no opposition. Accordingly, by this joint motion, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Defendant The Bank of Missouri’s time to

1 answer, move or otherwise respond to the Complaint in this action is extended from  
2 March 5, 2025 through and including **March 19, 2025**.

3 Good cause exists for the request. TBOM is still in the process of compiling,  
4 reviewing, and evaluating its business records and other files related to the allegations  
5 and claims in the Complaint. TBOM has requested this second extension so it has  
6 sufficient time to complete those tasks before responding to the Complaint, and Plaintiff  
7 approves. The Parties are also engaged in discussions regarding the action, including  
8 issues related to the arbitrability of certain claims. This second extension will provide the  
9 Parties with additional time to continue their discussions regarding the matter and the  
10 potential for a resolution of the claims early in the case.

11 This joint motion is filed in good faith and not for the purposes of delay. This is  
12 the second request for an extension of this deadline.

13 TBOM has not waived any objection to the venue or jurisdiction of the Court over  
14 the person of TBOM, or any other challenge to Plaintiff's complaint or other pleadings  
15 filed in this case.

16 Respectfully submitted, this 5th day of March, 2025.

17 **Consumer Attorneys PLLC**

19 /s/ Noah Kane  
20 Noah Kane, Esq.  
68-29 Main Street  
21 Flushing, NY 11367  
*Attorneys for Plaintiff Valerie Piskorowski*

22 **Legal Offices of James J. Lee**

24 /s/ James J. Lee  
25 James J. Lee, Esq.  
26 2620 Regatta Dr. #102  
Las Vegas, NV 89102  
27 *Attorneys for Defendant The Bank of  
Missouri*

## ORDER

IT IS SO ORDERED that the parties' joint motion (ECF No. 26) is GRANTED. The Bank of Missouri shall have until **March 19, 2025** to respond to the complaint.

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 3/6/2025